



PublicService Commission &lt;psc@utah.gov&gt;

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**NEM Docket 14-035-114**

1 message

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**Alex Blackmer** <ablackmer@atmosphereconservancy.org>

Fri, Jan 30, 2015 at 1:02 PM

To: PSC@utah.gov

Commissioners Ron Allen, David Clark, Thad LeVar

Utah Public Service Commission

Email: &lt;psc@utah.gov&gt;

Subject: Docket #14-035-114... Net Meter Study

January 30, 2015

Dear Commissioners,

The Colorado Renewable Energy Society is a statewide non-profit membership organization founded in 1996 to promote renewable energy and energy efficiency through education and advocacy in local communities. CRES sponsors energy conferences and has presented clean energy testimony in state and national regulatory hearings. This letter is prompted by our commitment to ensure a safe and sustainable future for our fellow citizens.

We were pleased to learn that you are planning to assess the costs and benefits of PacifiCorp's net metering program in Utah. We support customer-generated solar and wind power as a clean energy alternative to fossil fuels. As you develop the analytical framework to guide this assessment, we urge you to ensure that all relevant aspects are given their due consideration. Among aspects that certainly warrant inclusion are the health and welfare of the people of Colorado.

CRES is aware that PacifiCorp's energy generation system in Utah relies heavily on coal and gas combustion. We also know that harmful pollutants emitted by carbon fuel facilities in Utah typically migrate eastward into Colorado and other downwind states where they may cause significant health, economic, and environmental damage.

Many state, national, and international studies have documented the negative impacts of fossil fuel pollutants carbon dioxide, nitrous oxides, sulfur dioxide, ozone, and fine particulates. A 2010 Synapse Energy Economics study conducted for the State of Utah estimated that more than 200 people die prematurely each year due to "particulates and pollution emitted from generators in Utah". The report noted that "86% of these deaths occur in downwind states.

We are aware that the addition of renewable energy to the electrical grid reduces the amount of fossil fuels burned, thereby reducing the amount of harmful pollutants emitted and risks to the public. Any valid assessment of net metered renewable energy needs to take into account the societal benefits that accrue when coal and gas effluents are removed from the human environment.

Your costs-benefits analysis should monetize all known and potential health care, economic,

and environmental impacts of fossil fuel displacement by current and future net meter energy production. In fairness to Coloradans, your investigation should also measure the amount, concentration, and typical route of each carbon-generated pollutant migrating across the border.

This information will help monetize the costs we incur from energy generation in Utah.

We recommend that your Commission interface with the U.S. Environmental Protection Agency and with the Colorado Department of Health to establish an air monitoring system adequate to the task of measuring in detail the migration of power plant emissions from Utah into Colorado. We further recommend that the EPA and CO Dept of Health participate in any technical conferences that shape the scope, methodology, and implementation of the Commission's costs-benefits inquiry.

Thank you for your serious attention to our concerns and recommendations.

Yours sincerely,

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